



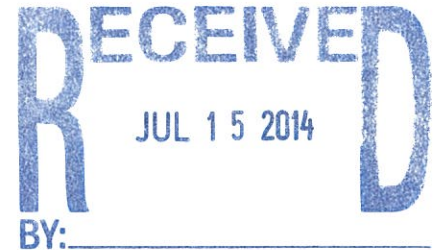
# Greater Antelope Valley Association of REALTORS®

1112 West Avenue M-4 • Palmdale, CA 93551 • 661.726.9175 • Fax: 661.726.9199

[www.gavar.org](http://www.gavar.org)

July 10, 2014

Carl Nadela  
Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, CA 90012



RE: Content and scope of the environmental information and analysis to be contained in the EIR for the Los Angeles County Antelope Valley Areawide General Plan Update

Dear Mr. Nadela:

The Greater Antelope Valley Association of REALTORS® is a local membership organization representing more than 1,500 Realtor® and affiliate members who conduct business in the Antelope Valley. One of the primary charters of real estate professionals is the protection of private property rights. This is the basis for our request that the following be included in the content and scope of the environmental information and analysis to be contained in the EIR for the Los Angeles County Antelope Valley Areawide General Plan Update (AVAP).

**Regarding the Proposed Significant Ecological Areas (SEA's):**

The Antelope Valley Areawide Plan has included the proposed SEA Ordinance and a significant expansion of over 150,000 acres of SEA designated property in its Land Use Plan. This overlay will bring the total number of acres encumbered by the SEA to over 290,000 acres in the Antelope Valley. This ordinance has not been approved by the Regional Planning Commission and is still being vetted through public comment. The AVAP should only analyze adopted ordinances and its EIR should not have to study un-adopted ordinance. With the November deadline given by the BOS, the AVAP EIR should not exhaust DRP's consultant's time with the examination of ordinance that may not even be adopted in the future.

Therefore, we ask that the AVAP EIR include an analysis of the approved SEA ordinance only. The proposed expansion should be studied only in the Project Alternatives and not the Project as proposed. In that analysis, include detailed scientific, research-based justification for the extent of the proposed designation areas including, but not limited to primary research on the potential impacts on agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation. Especially because of the extent of the potential degradation of population, housing and other human activity-related environmental activities, justification of the boundaries and the incumbent regulation of that land need a substantial basis to give the lead agency an opportunity to weigh the impacts. Additionally, the EIR must address the balance of the SEA's to environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance, therefore the analysis should address the economic impact on individual properties.

**Regarding the Rural Preservation Strategy:**

Please provide as an alternative study in the EIR for the AVAP the inclusion of land densities as presented in all currently approved CSD's and use those densities, which have been previously adopted by the county. Also, include in this alternative an extrapolation of those densities throughout the planning area as an alternate to the reduced

densities found in the rural preservation strategy. For example if the minimum lot size in an adopted CSD is 2.5 acres, then the study should use that density in the rural preserve area surrounding that community. If the minimum lot size is 5 acres, that is the density which should be used in studying the land use impacts in the rural preserve area surrounding that community.

**Regarding Agricultural Resources:**

The EIR should include a study which excludes current or previous agricultural lands from the rural preserve designation. Land which is currently, or has previously been used for agricultural uses and which is located outside of rural town centers should not be considered as "rural preserve" and subject to the extremely low densities which are associated with this designation. If this land is not removed from the "rural preserve" designation and its attendant low densities, farmers and ranchers may suffer extreme economic impacts. Their property values will be greatly reduced which will result in a dramatic limitation in the amount of money they can borrow against their land for continuing agricultural uses. The first five words in the preamble to the REALTORS® Code of Ethics are "Under all is the land," we believe this to be true and are concerned that if the perceived value of the land is stripped away by this plan due to extremely low densities for future development the farmer/rancher will likely not be able to afford financing to continue their current use of the land, or their current way of life thus defeating the stated goal of preserving agricultural resources. Potential devaluation of farmland and the consequences of doing so should be specifically studied.

**Regarding the Economic Opportunity Areas (EOA's):**

Please provide as an alternative study in the EIR for the AVAP a study which assumes the EOA's will be adopted as shown, without further action such as development of community plans prior to adoption of the EOA. Future land owners will still be required to submit a project level EIR for any development plans they want the County to approve. This will ensure Los Angeles County's ability to review proposed development within these EOAs in more detail without adding the unnecessary provision of creating a new Community Plan that will alter the EIR currently being drafted, or trigger the need for an amendment to the General Plan.

**Regarding Economic Impacts:**

The proposed AVAP focuses the majority of growth within specific areas, where most of the housing and local economic activity is currently located, in an effort to help strengthen a localized jobs housing balance. The extensive downzoning of all rural preserve areas outside of the rural town centers are extremely limiting to any future development. The EIR for the AVAP should include an analysis of the impacts of this plan to current property owners as they will not be able to use their land as freely as they could when they purchased it, or in the way in which they may under the guidelines of the current AVAP.

**Regarding Economy/Property Values/ Public Services and Infrastructure:**

The EIR should include an alternative economic study of potentially lower property tax revenue being generated for the county based on the value of properties which, due to the plan may be encumbered with a lower density or any other impediment to development, including but not limited to SEA's, HMA's, Hazards Constraints, and the extremely low densities associated with the Rural Preservation Strategy. It is believed that properties which are overly burdened with overlays will lose much of their future value to property owners, thereby reducing the taxable value. As any potential loss of property tax revenue will affect the ability of the County to continue to provide services and infrastructure maintenance, the potential decrease of property value and thereby property tax generation should be studied and quantified for the decision makers.

**Regarding Schools:**

The AVAP EIR must address the potential impacts on the several school districts in the valley (Eastside, Wilsona, Keppel, Gorman, Westside, Acton-Agua Dulce, Antelope Valley Union High School and Antelope Valley College). Each of these sovereign jurisdictions regularly reviews its demographic and growth parameters. The AVAP EIR must address how the activities of the plan effect those plans and policies and, in so far as is possible, provide how there is a conflict or consistency between the AVAP and the work of each district including but not limited to the areas of land use planning (over which the district hold certain levels of sovereignty), population and housing, delivery of public services, recreation and transportation. Additionally,

the EIR must address environmental justice concerns for the existing and potential future school and residential populations and constituencies that will rely on this valley to provide habitation, sustenance and education. Consideration must also be given to the long term impact that any change in land use has on the delivery of educational services. Decreasing rural density has a profound impact on delivery of instruction, length and cost of transportation, limitations on services to students, loss of revenue to school districts and thus reductions in staff. These may be unintended consequences of the proposed EIR.

**Use of the most recent information and studies:**

The AVAP is shaping the Antelope Valley for future generations. The EIR must include with its analysis current and proposed transit projects, including NW 138, High Speed Rail and High Desert Corridor. And population growth associated with Southern California Association of Governments RTP/SCS projections. With these projections included in the AVAP EIR, it will give a unified regional planning effort that will allow the community's future housing and jobs to be pro-active and bring economic growth to that region.

**Land Use Proscription by Pre-defined Constraint:**

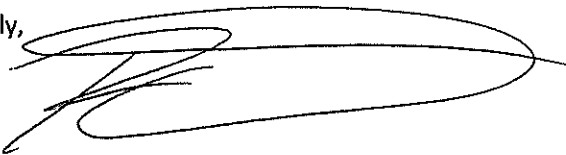
The land use patterns, densities and designations shown in the AVAP as proposed for the Project were developed under what has been described as a Hazard, Environmental and Resource Constraints Model (ECM) created by the county. The ECM is described as "a tool to inform stakeholders of potential site constraints and regulations" (General Plan Appendix C, Public Review Draft, 1/2014). However, the "tool to inform" about regulation has become the regulation itself.

The ECM is purported to 'front-load' all the underlying environmental hazards, issues, constraining factors and resources (or lack thereof) that could affect the ability of a particular site to be developed with improvements. However, the model's concept as presented does not provide any quantitative analysis or qualitative set of findings or determinations as to how the constraints identified translate into the development designations and densities imposed let alone the three 'classes' identified in the appendix.

After a thorough analysis of the ECM itself and the underlying data and assumptions, the EIR should address 'how', 'why' and 'with what data' the links between the ECM and the AVAP land use designations were arrived at. This substantiation is critical to all the land use, population, housing and environmental justice analysis throughout the EIR and will also inform many portions of the other areas of review and analysis.

We look forward to reviewing the analyses of the impact this plan will have on our local environment. It is our sincere hope that these analyses will lead to a good balance and appropriate land uses for the Antelope Valley.

Respectfully,

A handwritten signature in black ink, appearing to read 'Rob Talbot', written over a large, horizontal, oval-shaped line.

Rob Talbot, President

Cc: Supervisor Michael D. Antonovich  
Senator Steve Knight  
Assemblyman Steve Fox